

University Physicians Inc.



LIMITED DATASET POLICY

Latest Revision:

Original Effective Date: April 4, 2003

Purpose

This policy defines a Limited Dataset and outlines appropriate usage.

Policy

In addition to the de-identification of Protected Health Information (PHI), the final HIPAA privacy rule offers the additional ability to use or disclose slightly more information in a "limited dataset," if the use or disclosure is for the purpose of research, public health or health care operations, so long as the set excludes 16 specified identifiers that are listed in the rule.

A limited dataset is PHI that excludes specific, readily identifiable information, not only about the individuals themselves, but also their relatives, employers, and members of their households. The final rule specifies the identifiers that must be excluded.

To use or disclosure a limited dataset for the purpose of research, public health or health care operations, UPI must enter into a data use agreement with the recipient of the information. The agreement may take the form of a formal contract if the relationship is with a business associate. In the case of limited datasets for internal use including research, UPI may meet the standard by requiring members of its workforce to sign a confidentiality agreement. The agreement must meet detailed requirements similar to those of a business associate agreement, including specifying permitted uses and disclosures, identifying who may use or receive the limited data set, and restricting further use and disclosure.

The creation and disclosure of limited datasets requires authorization from the Privacy Officer or appropriate management.

Procedure

The following identifiers must be removed to create a limited dataset:

The direct facial identifiers include:

- Name
- Street Address (renamed postal address information, other than city, state and zip code)
- Telephone and fax numbers
- E-mail address
- Social Security Number
- Certificate/license numbers
- Vehicle identifiers and serial numbers
- URLs and IP addresses
- Full-face photos

Additional direct identifiers needing to be removed before PHI can be considered a “Limited Data Set”:

- Medical record numbers, health plan beneficiary numbers and other account numbers
- Device identifiers and serial numbers
- Biometric identifiers, including finger and voiceprints

Data use agreements, confidentiality agreements or contracts stipulating limited dataset usage need to be approved by the Privacy Officer prior to disclosure.

Definitions

See glossary for key terms and acronyms used in this policy.
(On file with Privacy Officer)

Enforcement

Enforcement of this policy will reside with the Privacy Officer or appropriate Management.

**Rationale/
Source**

This policy complies with requirements of the following:
Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule

**Cross
References**

For additional information, refer to the following:

Document Name
De-identification of Information Policy
Confidentiality Statement

**Review or
Revision Date**

This policy is reviewed and approved annually, and as revised.

MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

Governance

Responsibility for adoption and/or implementation of this policy is as follows:

Approving Body		Executive Approval	
Privacy Officer:	04/04/03	Chief Operating Officer:	04/04/03
Signature on file.	Date	Signature on file.	Date